

Message

From: Pratt, Marirose [Pratt.Marirose@epa.gov]
Sent: 2/18/2022 4:21:22 PM
To: Kler, Denis [Kler.Denis@epa.gov]
Subject: RE: New Indy - comments on 114 initial response 2/10/2022

Hahaha. You should try my mac n' cheese. You'd think that would be simple enough but according to my kids, I make it "too cheesy." (hand on forehead emoji).

Marirose J. Pratt (she/her)
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From: Kler, Denis <Kler.Denis@epa.gov>
Sent: Thursday, February 17, 2022 4:14 PM
To: Pratt, Marirose <Pratt.Marirose@epa.gov>
Subject: RE: New Indy - comments on 114 initial response 2/10/2022

Marirose,
I can't imagine you mucking anything up.
Please add a period to #4.

Denis B. Kler
U.S. EPA Region 4
Enforcement and Compliance Assurance Division
Policy, Oversight and Liaison Office
Phone: 404-562-9199

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From: Pratt, Marirose <Pratt.Marirose@epa.gov>
Sent: Thursday, February 17, 2022 3:56 PM
To: Kler, Denis <Kler.Denis@epa.gov>
Subject: RE: New Indy - comments on 114 initial response 2/10/2022

Hi Denis,

Sorry to email so late in the day. Here is a proposed email that condenses your questions down a bit for me to send to New Indy's counsel. Please review and let me know if mucked anything up in my effort to consolidate.

Thanks!
Marirose

Hi Jim,

Thank you for the status update on New Indy's response to EPA's most recent CAA Section 114 request.

My program clients have a few follow up questions regarding the update.

1. You state that the date, time, and duration of when the stripper off gases are vented to the atmosphere and not sent to the corresponding air pollution control device is not data that is measured. Can you please explain how New Indy complies with the requirements for the steam stripper bypass in 40 CFR §§ 63.443, 63.450(d), and CFR 63.454 if New Indy does not collect or maintain records of this data?
2. Please elaborate on why monthly records of SO₂ emissions are not available. (It is the EPA's understanding that the company maintains records of SO₂ captured by wood ash (daily records) and annual SO₂ emissions (monthly records and 12-month rolling sum records). Combination boiler #1 and combination boiler #2, are emission units that are part of the monthly SO₂ emission calculations).
3. Please explain how monthly SO₂ emissions from combination boiler #1 and combination boiler #2 are calculated without knowing the amount of SOGs and NCGs incinerated in the boilers.
4. Please elaborate on why monthly bleach and unbleached production data is not available prior to January 2007
5. Please elaborate on why annual pulping system closed collection system method 21 evaluations, monthly condensate closed collection system inspections, and annual condensate closed collection system method 21 evaluations are not available prior to 2014.

Your status update did not indicate that New Indy would need additional time to respond to the 114 request. Can you please confirm that New Indy is planning to submit a complete response to the 114 request by the original deadline or do you anticipate requesting an extension?

Regards,

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From: Kler, Denis <Kler.Denis@epa.gov>
Sent: Wednesday, February 16, 2022 9:48 AM
To: Taylor, Kevin <Taylor.Kevin@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Pratt, Marirose <Pratt.Marirose@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Mills, Andrew <mills.andrew@epa.gov>
Cc: Foley, Patrick <Foley.Patrick@epa.gov>
Subject: New Indy - comments on 114 initial response 2/10/2022

All,

Ex. 5 DP / Ex. 7(A)

Please review and let me know if you have any comments or questions. Also, please add any additional questions you may have.

Denis

***** Draft clarification questions *****

General Process information

*Monthly bleach production – provide information as why the data is not available prior to January 2007.

*Monthly unbleached production - provide information as why the data is not available prior to January 2007.

*Steam stripper bypass – 40 CFR Part 63 requires the owner or operator to maintain these records (see below). Provide information as to why these records are unavailable.

40 CFR 63.441 defines “Low volume, high concentration or LVHC system” as the collection of equipment including the digester, turpentine recovery, evaporator, steam stripper systems, and any other equipment serving the same function as those previously listed.

40 CFR 63.443(a)(1)(i) states that each LVHC system shall be controlled.

40 CFR 63.443(c) states that equipment systems listed in paragraphs (a) and (b) of this section shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in paragraph (d) of this section. The enclosures and closed-vent system shall meet the requirements specified in § 63.450.

40 CFR 63.443(e) states that periods of excess emissions reported under § 63.455 shall not be a violation of § 63.443(c) and (d) provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed the following levels:

(1) One percent for control devices used to reduce the total HAP emissions from the LVHC system;

40 CFR 63.450(d) states that each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§ 63.443, 63.444, or 63.445 shall comply with either of the following requirements:

(1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that is capable of taking periodic readings as frequently as specified in § 63.454(e). The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or
(2) For bypass line valves that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.

40 CFR 63.454(b) requires the owner or operator to maintain the following records:

(11) the position and duration of opening of bypass line valves and the condition of any valve seals; and

(12) The duration of the use of bypass valves on computer-controlled valves.

40 CFR 63.454(d) The owner or operator shall set the flow indicator on each bypass line specified in § 63.450(d)(1) to provide a record of the presence of gas stream flow in the bypass line at least once every 15 minutes.

*Monthly SO₂ emission records – It is the EPA’s understanding that the company maintains records of SO₂ captured by wood ash (daily records) and annual SO₂ emissions (monthly records and 12-month rolling sum records). Combination boiler #1 and combination boiler #2, are emission units that are part of the monthly SO₂ emission calculations. Provide information as to why these records are unavailable.

*Monthly quantity of SOGs incinerated – Provide information as to how monthly SO₂ emissions from combination boiler #1 and combination boiler #2 are calculated without knowing the amount of SOGs incinerated in the boilers.

*Monthly quantity of NCGs incinerated – Provide information as to how monthly SO₂ emissions from combination boiler #1 and combination boiler #2 are calculated without knowing the amount of NCGs incinerated in the boilers.

40 CFR Part 63 Subpart S

*Annual pulping system closed collection system method 21 evaluations – Provide information as to why the records are unavailable prior to 2014.

*Monthly condensate closed collection system inspections – Provide information as to why the records are unavailable prior to 2014.

*Annual condensate closed collection system method 21 evaluations – Provide information as to why the records are unavailable prior to 2014.

Denis B. Kler
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